IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number	:	10/830,114	Confirmation No.:	9022
Applicant	:	Margaret S. Brenner		
Filed	:	4/23/2004		
Title	:	**System and Method for Management and Delivery of Content and Rules**		
TC/Art Unit	:	3629		
Examiner:	:	Candice D. Carter		
Docket No.	:	JPC-024 (47004.000267)		
Customer No.	:	**70813**		

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APPEAL BRIEF

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APPEAL BRIEF

Sir:

This Appeal Brief is filed in support of the Notice of Appeal filed on August 17, 2009. Each item required by 37 C.F.R. §41.37 is set forth below.

Appellants respectfully request that the Board of Patent Appeals and Interferences reconsider and withdraw the rejection of record, and allow the pending claims, which are attached hereto as Appendix A.

The USPTO is authorized to charge the fee due in compliance with 41.20(b)(2) in compliance with 37 CFR 1.17 and any additional deficiencies to the undersigned's Deposit Account No. 50-4494.

I.   REAL PARTY IN INTEREST

The real party interest is JPMorgan Chase Bank, N.A.. The Appellants, Margaret S. Brenner and Scott C. Proud, are the joint inventors in the above-identified patent application. The inventors have assigned their entire interest in the above-identified patent application to JPMorgan Chase Bank, N.A. having a place of business at 270 Park Ave., New York, NY 10017.

II.   RELATED APPEALS, INTERFERENCES, AND JUDICIAL PROCEEDINGS

The Appellants, the Appellants' legal representative, and the Assignee are not aware of any other appeals or interferences which will directly affect, be directly affected by, or have a bearing on the Board's decision in this Appeal.

III.   STATUS OF CLAIMS

    A.   Total Number of Claims Pending in Application

    There are 33 claims pending in the application.

    B.   Current Status of Claims

        1.   Claims canceled: none

        2.   Claims withdrawn: none

        3.   Claims pending: 1-33

        4.   Claims rejected: 1-33

        5.   Claims allowed: none

    C.   Claims on Appeal

    Claims 1-33 are on appeal.

IV.   STATUS OF AMENDMENTS

An Amendment was made to the currently pending claims on July 14, 2009 after the

Final Rejection of May 18, 2009 and was entered as indicated on the Advisory Action dated July

29, 2009.

V.   SUMMARY OF CLAIMED SUBJECT MATTER

The present invention, as set forth in the claims and as described in the specification of the above-identified patent application, is directed to a system and method for managing communications for an organization such that content, data, and rules can be delivered to multiple presentation channels in a media independent format. The content and data are combined at the presentation channels based on the rules at the presentation channels in order to deliver communications having specific content and physical layout.

Claim 1 defines a computer-implemented method for management and delivery of content and rules. The method comprises managing, for an organization, a plurality of data and a plurality of content in separate database entities (*Step 104, page 8, line 23 – page 9, line 4*). The managing is accomplished using a computer processor and the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content. (*Step 104 and page 9, line 18 through page 10, line 2*). The method further includes packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels (*Step 110, page 10, lines 20 through page 11, line 2*), wherein at least part of the plurality of content is integrated with at least part of the plurality of data (*Step 106 and page 10, line 4, through page 10, line 8*). The method further comprises delivering the plurality of data and the carrier to the multiple presentation channels (*Step 112, and page 10, line 20 through page 11, line 2*) and integrating, using processing tools at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content (*Step 114, page 11, lines 4-11 and page 9, lines 21 and*

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22). The method of claim 1 additionally includes distributing the integrated data and content through the multiple presentation channels (*Step 116, page 11, lines 12-19*).

Claim 16 defines a system for management and delivery of content and rules. The system (*See Fig. 3*) comprises at least one first database entity (*310, 312, 314, page 13, lines 24 and 25 of specification*) that manages a plurality of data and at least one second database entity (*306, page 13, line 3*) that manages a plurality of content. The plurality of content is associated with the plurality of data based on a plurality of rules (*308, page 13, lines 21 and 22*). The plurality of rules controls a logical combination and physical layout of the plurality of data and plurality of content (*See page 9, lines 19-22*). The system further includes a processor module, a delivery module (*302, See page 14, lines 1-6*) and multiple presentation channels (*316, 318, 320, and 322, See page 13, lines 15 and 16*). The processor module packages the plurality of rules with the plurality of content in a carrier that is independent from the multiple presentation channels (*Step 110, page 10, lines 20 through page 11, line 2*), wherein at least part of the plurality of content is integrated with at least part of the plurality of data. *(Step 106 and page 10, line 4, through page 10, line 8*). The delivery module delivers the plurality of data and the carrier to the multiple presentation channels. (*Step 112, and page 10, line 20 through page 11, line 2*). The multiple presentation channels integrate the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content, and distribute the integrated data and content *Step 114, page 11, lines 4-11 and page 9, lines 21 and 22*).

Claim 31 is a system claim set forth in means-plus-function format, which substantially mirrors the subject matter summarized above with respect to claim 16.

Claim 32 is a computer-readable medium claim having subject matter that substantially mirrors the subject matter summarized above with respect to claim 1.

Claim 33 defines a method for management and delivery of content and rules. The method comprises managing, for an organization, a plurality of data and a plurality of content in separate database entities. (*Step 104, page 8, line 23 – page 9, line 4*). The managing is accomplished using a computer processor. The plurality of data is associated with a plurality of products and a plurality of clients and the plurality of content is stored in at least one media-independent format (*Step 104 and page 9, line 18 through page 10, line 2*) and comprises at least one of a discrete text element, a compiled text element and a graphic element (*See page 8, line 24 – page 9, line 7*). The plurality of content is associated with the plurality of data based on a plurality of rules. The method additionally includes packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data. (*Step 110, page 10, lines 20 through page 11, line 2*). The plurality of content is packaged based on an extensible markup language (XML) and the plurality of rules are packaged based on an XSL transformations (XSLT) language. (*See page 10, lines 13-19*). The method additionally includes delivering the plurality of data and the carrier to the multiple presentation channels, wherein the multiple presentation channels comprise at least one of an Internet website, a printed communication, an electronic communication, a printed advertisement, a broadcast advertisement, a telemarketing script, an interactive voice response unit message, an automatic teller machine (ATM) message, and a display-board message (*Step 114, page 11, lines 4-11 and page 9, lines 21 and 22*). The method further includes integrating, using computer processing tools at the multiple presentation channels, the plurality of data with

the plurality of content based on the plurality of rules and specific needs of the multiple presentation channels (*Step 114, page 11, lines 4-11 and page 9, lines 21 and 22*) and distributing the integrated data and content through the multiple presentation channels (*Step 116, page 11, lines 12-19*).

VI.   **GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

A.   Claims 1-15 and 33 stand rejected under 35 U.S.C. §101 based on an allegation of non-statutory subject matter.

B.   Claims 1-6, 9-21, 24, and 26-32 stand rejected under 35 U.S.C. §103(a) over U.S Patent Publication No. 2002/0095481 to George et al. (hereinafter "George") in view of U.S. Patent No. 6,009,410 to LeMole et al. (hereinafter "LeMole") and U.S. Patent Publication N0. 2005/0010472 to Quatse et al. (hereinafter "Quatse").

C.   Claims 7, 8, 22, 23, and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over George and LeMole in view of Quatse and in further in view of Todd (U.S. Pub. No. 2003/0061057).

VII.   ARGUMENT

A.   Claims 1-15 and 33 as Amended are Directed to Statutory Subject Matter

Claims 1-15 and 33 were rejected in the Final Rejection dated May 18, 2009 under 35 U.S.C. §101 based on an allegation of non-statutory subject matter. However, in the Amendment after Final Rejection, dated July 14, 2009, amendments to the claims were submitted to overcome this rejection. The Advisory Action, dated July 29, 2009 indicates that the amendments submitted after the final rejection will be entered. Although the Advisory Action does not specifically indicate withdrawal of the rejection under 35 U.S.C. §101, Appellants maintain that the claims as currently presented are fully statutory.

Claims 1 and 33 as amended are directed to a computer-implemented method tied to a particular machine. The amendments to the claims are supported in the specification, for example, on pages 13 and 14 of the specification in the description of FIG. 3 and on page 11, first full paragraph. All of the aforementioned claims fully comply with the statutory requirements of 35 U.S.C. §101.

The claims define a method falling within the categories of statutory subject matter defined by 35 U.S.C. §101 and are fully compliant with the requirements set forth in *In re Bilski*, 545 F.3d 943, 88 USPQ2d 1385 (Fed. Cir. 2008). As set forth in *Bilski*, the test for a method claim is whether the claimed method is (1) tied to a particular machine or apparatus, or (2) transforms a particular article to a different state or thing. Pending method claims 1 and 33 require that the method steps be carried out using a particular *computer processor and computer processing tools* and thus are tied to a particular machine or apparatus in compliance with the first prong of the *Bilski* test.

Furthermore, the pending claims are not directed to any exception to 35 U.S.C. §101 statutory categories, which include abstract ideas, laws of nature, and natural phenomena as set

forth in MPEP 2106. 35 U.S.C. §101 creates statutory categories and exceptions to those statutory categories. The claims of the application fall squarely within the defined statutory categories including a process, machine, manufacture, or composition of matter and do not fall within any of the exceptions to statutory subject matter.

Because all of claims 1-33 qualify as statutory under the guidelines set forth in 35 U.S.C. §101, withdrawal of the rejection is respectfully requested.

B. Summary of Asserted Art

George is directed to a system for managing electronic communication received by customers from vendors and service providers. The system aims to filter the large quantity of information that a vendor provides to a customer in order to enable the customer to receive only items of interest and to enable the vendor to better select items of interest to the particular customer. In George, a customer **102** provides data to a data management system **104**. The data management system **104** includes both customer provided data sets **106** and customer behavioral data sets **108**. The customer behavioral data sets **108** may be stored in a customer profile behavioral database **110**. The behavioral data sets may be gathered, for example, based on web site locations visited by a customer on a vendor's website. A content database **112** is provided by the vendor to store product and service data sets. (*See Figure 1 and paragraphs 16-19 of George.)*

An email content merge program **114** selects a product data set from the content database **112** based on customer-provided data **106**, customer behavioral data **108**, and vendor business rules. *(See paragraph 23 of George.)* A message may be delivered to the customer through server **116**. If the customer selects any links in the transmitted message, this customer behavioral data **118** may be captured for the database **108**. Thus, through this feedback process, communications between customers and vendors is improved.

LeMole discloses a customized advertising repository server through which a user can access a dynamically configured composite advertising page, configured specifically for that user. More specifically, a user at a client terminal **101** registers for the service by submitting a profile to an HTTP server **100**. To utilize the service, the client terminal **101**sends a request over the Internet **103** to access a content server including http server **110** and CAR server **111**. The CAR server **111** consults an associated database for the user profile. Based on the stored profile together with information about previously visited sites, the CAR server **111** dynamically produces a personalized composite advertising page. (*See Column 7, lines 6-36 of LeMole*).

Quatse discloses a system for distributing promotional materials based on a probability of user acceptance. Quatse is asserted by the Examiner merely for its use of multiple presentation channels.

C.   Claims 1-6, 9-24, and 26-32 are Patentable over The Combination of George, LeMole, and Quatse

The obviousness rejection is improper for at least the following reasons: (1) the references cited fail to teach or suggest all the claim elements; (2) the citations and interpretation of the references are not coherent or self-consistent; and (3) there is simply no reason or motivation for combining the bits and pieces of these references.

1.   The Combination of references fails to suggest all claim elements of Claim 1.

George discloses a system that is useful for customers to customize receipt of information from vendors. The customization is achieved by storing customer behaviors in response to receipt by the customer of system data. George discloses associating customer behavior with stored products by a set of rules and sending an email to the customer based on the relationship between the customer behavior and the stored products.

In contrast, the claimed system manages communications for an organization *such that content, data, and rules can be delivered to multiple presentation channels in a media independent format*. The content and data are combined based on the rules at the presentation channels in order to deliver communications having specific content and physical layout.

In addition to having a fundamentally different character to that of the claimed invention, George fails to disclose several features of the pending claims. For example, with respect to independent claim 1, George fails to disclose a computer-implemented method for management and delivery of content and rules. George *does not "deliver" rules in any sense of the word*. Whereas the rules of claim 1 are delivered to the presentation channels, the "rules " of George are applied, but never delivered.

As acknowledged in the Office Action, George further fails to disclose the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content. George also fails to disclose packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data. In fact, George fails to "package" rules at all. George merely applies rules to determine delivered content.

George further fails to disclose delivering the plurality of data and the carrier to the multiple presentation channels. As set forth in claim 1, the carrier contains rules, and George fails to deliver or package rules. The "e-mail content merge program" and "server **116**" described in paragraph 19 of George do not perform the steps of packaging rules with content or delivering data and carrier (with the packaged rules and content) to presentation channels. The "e-mail content merge program" and "server **116**" in George are themselves part of a

presentation channel that performs the step of integrating data with content immediately before communicating to customers. No delivery of rules is contemplated. The table below provides a quick comparison of what is being packaged/delivered in the claimed invention versus in George's disclosure —

	Claimed Invention (claim 1)	**George (para. 19)**
What is packaged?	"the plurality of rules with the plurality of content"	"at least one product data set"
In what form?	"a carrier that is independent from the multiple presentation channels"	"a communications message, such as an e-mail message"
What is delivered?	"the plurality of data and the carrier" (***containing rules***)	"a communications message, such as an e-mail message"
Delivery to whom?	"to the multiple presentation channels"	"to the customer"

George also fails to disclose integrating, using processing tools at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content. Finally, George fails to disclose distributing the integrated data and content through the multiple presentation channels.

The Final Office Action alleges (*See page 5, last full paragraph*), that LeMole discloses applying the plurality of rules to control a logical combination and physical layout of the plurality of data and plurality of content, citing column 7, lines 36-55 of LeMole. Applicant respectfully submits that the cited portion of LeMole simply fails to disclose "the plurality of rules controlling a logical combination and physical layout of the plurality of data and content." LeMole merely discloses applying rules to select content.

Furthermore, in addition to this failure, LeMole fails to obviate the deficiencies of George noted above. ***LeMole fails to deliver rules*** as required by claim 1. LeMole is directed to

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controlling the presentation of a web page and thus centrally controls the content without

delivering rules to multiple presentation channels. Accordingly, LeMole also fails to deliver

rules and subsequently apply the rules to form the logical combination and physical layout of

claim 1. LeMole also fails to disclose packaging the rules with the content in a carrier that is

independent from multiple presentation channels.

The Final Office Action further states on page 6, that Quatse is provided for its disclosure

of multiple presentation channels, referencing paragraph 36 of Quatse. Quatse also fails to

obviate the deficiencies of George. Quatse also fails to deliver rules. Quatse further fails to

disclose packaging the rules with the content in a carrier that is independent from multiple

presentation channels and delivering the carrier to the multiple presentation channels.

Thus, even if combined, all three of the applied references lack at least the following

features of claim 1: *(1) delivering rules; (2) packaging the rules with the content in a carrier*

that is independent from multiple presentation channels and delivering the data and carrier to

the multiple presentation channels; and (3) integrating, using processing tools at the multiple

presentation channels, the plurality of data with the plurality of content based on the plurality

of rules in order to logically integrate the data and content and control the physical layout of

the integrated data and content.

Thus, even if combined, George, LeMole, and Quatse would not have resulted in the

inventions set forth in the claim 1. Accordingly, a *prima facie* case of obviousness cannot be

established. In order to establish a *prima facie* case of obviousness of a claimed invention, all

the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981,

180 USPQ 580 (CCPA 1974). That is, "[a]ll words in a claim must be considered in judging the

patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 165 USPQ 494, 496 (CCPA 1970); *In re Edward S. Lowry*, 32 F.3d 1579, 1582 (Fed. Cir. 1994).

Under 35 U.S.C. §103, the Patent Office bears the burden of establishing a *prima facie* case of obviousness. In re Fine, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). Appellants respectfully submit that the Examiner is far from meeting the burden of proof in establishing *prima facie* obviousness of the appealed claims.

It is beyond dispute that KSR grants the Examiner a more flexible framework for conducting the obviousness inquiry. However, the principle that a well-founded rejection must *account for the invention as a whole including all claim limitations* still applies, else the rejection cannot be sustained. KSR Intern. Co. v. Teleflex Inc., 127 S.Ct. 1727, 1734, 1740 (2007)(inquiry based on "the subject matter as a whole", "claimed subject matter"); 35 U.S.C. § 103 ("subject matter as a whole"); MPEP §§ 2141.02 ("Claimed invention as a whole must be considered"), 2143.03 ("All claim limitations must be considered"); 2143.A (obviousness rejection must show "each element claimed", "all the claimed elements"); *see* In re Lowry, 32 F.3d 1579, 32 USPQ.2d 1031, 1034 (Fed. Cir. 1994)(examiner must consider all claim limitations when determining patentability of invention over prior art)(citing In re Gulack, 703 F.2d 1381, 217 USPQ 401, 405 (Fed. Cir. 1983)); In re Wilson, 424 F.2d 1382, 165 USPQ 494, 496 (CCPA 1970)("All words in a claim must be considered in judging the patentability of that claim against the prior art.").

2. The citations and interpretation of the references are not coherent or self-consistent.

Additionally, the fact that the Final Office Action cites the same paragraph from George against three distinct elements recited in the independent claims shows inconsistency in this ground of rejection. On pages 4-5, the Final Office Action cites paragraph 19 from George

(construction of an e-mail message") as allegedly disclosing the "processor module," "delivery module" and "presentation channels" with the respective packaging, delivering and integrating functions as recited in the independent claims. However, these elements and functions are clearly different from one another based on the plain language of the claims, and therefore this is not a situation where the Examiner could kill three birds with one stone.

3. No motivation exists for combining these references.

Furthermore, applicant respectfully submits that no motivation would have been present for the asserted combination. For example, the Final Office Action asserts that it would have been obvious to modify George by using rules to control a logical combination and physical layout of data and content since "this would increase the probability of presenting information that is of particular interest to the particular user." However, adding this suggested modification would actually not change the information presented.

Furthermore, with respect to Quatse, the Office Action asserts that it would have been obvious to include the multiple presentation channels "in order to reduce the negative effects of distributing offers on paper." (*page 6, paragraph 2 of the Office Action*). However, since George does not distribute offers on paper, this motivation appears to be nonsensical.

Additionally, the Office Action cites Quatse for its disclosure of "multiple presentation channels" as if multi-channel content management is just one discrete piece. The reference would not teach an ordinary artisan how to transform disclosures of discrete-channel content management in (such as George and LeMole) into the multi-channel content management of the present invention.

Additionally, there is no reason to combine the applied references as none of them is related to content management for multiple channels as presently claimed. Out of the three applied references, George and LeMole are related to content management. However, both of

them fall into the category of "single-functioned" (or single-channel) methods which Appellant has already criticized in the "Background of the Invention" section. (*See Present Application at page 2, line 14 – page 3, line 6.*) That is, George and LeMole are each concerned with only one communication channel only. For George, the channel is E-mail messages and for LeMole it is Internet ads. Quatse discloses little (if anything) on content management and instead describes a targeted marketing methodology.

References should not be combined simply because they are combinable. The Examiner must articulate some reason or motivation for a person of ordinary skill to combine them. In the present case, no such reason or motivation exists to modify George or LeMole with Quatse to coordinate content management among multiple channels.

Furthermore, it is not at all necessary for George to package rules with content before delivering the carrier to multiple channels as George deals with only one channel (i.e., E-mail). Applicant has not found any other portion of the cited references that could remedy this deficiency.

4.   Claims 2-6 and 9-15 are allowable over the combination of George, LeMole, and Quatse.

Claims 2-6 and 9-15 depend from claim 1 and therefore define over the art of record for at least the reasons set forth above with respect to claim 1.

5.   Claim 16 is allowable over the combination of George, LeMole, and Quatse.

With respect to independent claim 16, this claim includes parallel limitations to those described above with respect to claim 1. Accordingly, the references in combination fail to disclose or render obvious the invention of claim 16 for the reasons set forth above. Furthermore, applicant notes that the Final Office Action repeatedly misquotes the language of claim 16. For example, on page 4, the Office Action refers to "and one or more presentation

channels", when claim 16 requires multiple presentation channels as set forth above with respect to claim 1.

6. Claims 17-21 and 24-30 are allowable over the combination of George, LeMole, and Quatse.

Claims 17-21 and 24-30 depend from claim 16 and are thus allowable over the art of record for at least the reasons set forth above with respect to claim 16. Appellant notes that Claim 25 has not been addressed in the Office Action or rejected on any grounds whatsoever, but is also allowable over the art of record for the reasons set forth above.

7. Claims 31 and 32 are allowable over the combination of George, LeMole, and Quatse.

Claims 31 and 32 are independent means-plus-function and computer-readable medium claims respectively. These claims include limitations parallel to those referenced above with respect to claim 1 and are accordingly allowable over the art of record for the reasons set forth above. Withdrawal of the rejection of claims 1-6, 9-21, and 24-32 under 35 U.S.C. §103(a) is respectfully requested.

D. Claims 7, 8, 22, 23, and 33 are Patentable over George, LeMole, Quatse and Todd

1. Claims 7, 8, 22, and 33 are allowable.

Todd fails to obviate the deficiencies of the references discussed above. Thus, with respect to claim 7, 8, 22, and 23, these claims depend from claims 1 and 16 respectively and are thus also allowable over the art of record.

2. Independent Claim 33 is allowable.

Claim 33 is an independent claim including limitations that parallel those of the independent claim 1 discussed above as well as additional limitations.. Specifically, claim 33 additionally requires that the plurality of stored content comprises at least one of a discrete text

element, a compiled text element and a graphic element, and the plurality of content is associated with the plurality of data based on a plurality of rules. Claim 33 also additionally requires that the plurality of content is packaged based on an extensible markup language (XML), and the plurality of rules are packaged based on an XSL transformations (XSLT) language. Because George, LeMole and Quatse fail to disclose the packaging and delivery of rules, the application of Todd to disclose XSL and XSLT formats is nonsensical as the references are simply not combinable as the Office Action asserts.

A prior art reference must be considered in its entirety, i.e. as a whole, including portions that would lead away from the claimed invention. *W.L. Gore & Associates, Inc. v. Garlock, Inc.,* 721 F.2d 1540, 220 USPQ 303 (Fed. Cir 1983), cert. denied, 469 U.S. 851 (1984). If the proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon,* 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Thus, because the references, even if combined would not have resulted in the invention of claims discussed above, and further because no motivation would have been present to modify George in the stated manner, the references fail to render obvious the invention of the above-identified claims. Withdrawal the rejection under 35 U.S.C. §103 is therefore respectfully requested.

VIII.   CLAIMS APPENDIX

Appendix A contains a listing of currently pending claims.

IX.   EVIDENCE APPENDIX

No Evidence Appendix is included herewith.

X.   RELATED PROCEEDINGS APPENDIX

No Related Proceedings Appendix is included herewith.

Dated: September 30, 2009

Respectfully submitted,

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Appendix A: Listing of Claims

<u>LISTING OF PENDING CLAIMS</u>

1.   (**Previously Presented**) A computer-implemented method for management and delivery of content and rules, the method comprising:

managing, for an organization, a plurality of data and a plurality of content in separate database entities, the managing accomplished using a computer processor, wherein the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content;

packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data;

delivering the plurality of data and the carrier to the multiple presentation channels;

integrating, using processing tools at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content; and

distributing the integrated data and content through the multiple presentation channels.

2.   (**Previously Presented**) The method according to claim 1, wherein the plurality of data is associated with a plurality of products and a plurality of clients.

3.   (**Previously Presented**) The method according to claim 1, wherein the plurality of data and the plurality of content are associated with financial products.

4.   (**Original**) The method according to claim 1, wherein the carrier comprises a plurality of style tags, wherein the plurality of style tags are associated with the plurality of content based on the plurality of rules.

5.   (**Original**) The method according to claim 1, wherein the plurality of content comprises at least one of:

a discrete text element;

a compiled text element; and

a graphic element.

6.   (**Original**) The method according to claim 1, wherein the plurality of content is stored in at least one media-independent format.

7.   (**Original**) The method according to claim 1, wherein the plurality of content is packaged based on an extensible markup language (XML).

8.   (**Original**) The method according to claim 1, wherein the plurality of rules are packaged based on an XSL transformations (XSLT) language.

9.   (**Previously Presented**) The method according to claim 1, wherein the integration of the plurality of data with the plurality of content is further based on specific needs of the multiple presentation channels.

10.   (**Original**) The method according to claim 1 further comprising sharing the plurality of data and the plurality of content among a plurality of lines of business.

11. **(Original)** The method according to claim 1 further comprising editing the plurality of content and the plurality of business rules via a user interface.

12. **(Original)** The method according to claim 1 further comprising previewing at least one combination of the plurality of data and the plurality of content for legal compliance.

13. **(Original)** The method according to claim 1 further comprising auditing the integrated data and content prior to the step of distributing.

14. **(Original)** The method according to claim 1 further comprising automatically generating at least one layout file for distribution.

15. **(Previously Presented)** The method according to claim 1, wherein the multiple presentation channels comprise at least one of:

an Internet website;

a printed communication;

an electronic communication;

a printed advertisement;

a broadcast advertisement;

a telemarketing script;

an interactive voice response unit message;

an automatic teller machine (ATM) message; and

a display-board message.

16. (**Previously Presented**) A system for management and delivery of content and rules, the system comprising:

at least one first database entity that manages a plurality of data;

at least one second database entity that manages a plurality of content, wherein the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content;

a processor module;

a delivery module; and

multiple presentation channels;

where

the processor module packages the plurality of rules with the plurality of content in a carrier that is independent from the multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data,

the delivery module delivers the plurality of data and the carrier to the multiple presentation channels, and

the multiple presentation channels integrate the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and

content and control the physical layout of the integrated data and content, and distribute the integrated data and content.

17.   (**Previously Presented**) The system according to claim 16, wherein the plurality of data is associated with a plurality of products and a plurality of clients.

18.   (**Previously Presented**) The system according to claim 16, wherein the plurality of data and the plurality of content are associated with financial products.

19.   (**Original**) The system according to claim 16, wherein the carrier comprises a plurality of style tags, wherein the plurality of style tags are associated with the plurality of content based on the plurality of rules.

20.   (**Original**) The system according to claim 16, wherein the plurality of content comprises at least one of:

a discrete text element;

a compiled text element; and

a graphic element.

21.   (**Original**) The system according to claim 16, wherein the plurality of content is stored in at least one media-independent format.

22.   (**Original**) The system according to claim 16, wherein the plurality of content is packaged based on an extensible markup language (XML).

23.   (**Original**) The system according to claim 16, wherein the plurality of rules are packaged based on an XSL transformations (XSLT) language.

24.   (**Previously Presented**) The system according to claim 16, wherein the integration of the plurality of data with the plurality of content is further based on specific needs of the multiple presentation channels.

25.   (**Original**) The system according to claim 16 further comprising a sharing module that shares the plurality of data and the plurality of content among a plurality of lines of business.

26.   (**Original**) The system according to claim 16 further comprising a change management interface for editing the plurality of content and the plurality of business rules.

27.   (**Original**) The system according to claim 16 further comprising a preview interface for previewing at least one combination of the plurality of data and the plurality of content for legal compliance.

28.   (**Original**) The system according to claim 16 further comprising an auditing interface for auditing the integrated data and content prior to the step of distributing.

29.   (**Original**) The system according to claim 16 further comprising a generation module that automatically generates at least one layout file for distribution.

30.   (**Previously Presented**) The system according to claim 16, wherein the multiple presentation channels comprise at least one of:

an Internet website;

a printed communication;

an electronic communication;

a printed advertisement;

a broadcast advertisement;

a telemarketing script;

an interactive voice response unit message;

an automatic teller machine (ATM) message; and

a display-board message.

31.   (**Previously Presented**) A system for management and delivery of content and rules, the system comprising:

means for managing, for an organization, a plurality of data and a plurality of content in separate database entities, wherein the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content;

means for packaging the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data;

means for delivering the plurality of data and the carrier to the multiple presentation channels;

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means for integrating, at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content; and

means for distributing the integrated data and content through the multiple presentation channels.

32.   **(Previously Presented)** A computer readable medium having code for causing at least one processor to manage and deliver content and rules, the computer readable medium comprising:

code adapted to manage, for an organization, a plurality of data and a plurality of content in separate database entities, wherein the plurality of content is associated with the plurality of data based on a plurality of rules, the plurality of rules controlling a logical combination and physical layout of the plurality of data and plurality of content;

code adapted to package the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data;

code adapted to deliver the plurality of data and the carrier to the multiple presentation channels;

code adapted to integrate, at the multiple presentation channels, the plurality of data with the plurality of content based on the plurality of rules in order to logically integrate the data and content and control the physical layout of the integrated data and content; and

code adapted to distribute the integrated data and content through the multiple presentation channels.

33.   (**Previously Presented**) A method for management and delivery of content and rules, the method comprising:

managing, for an organization, a plurality of data and a plurality of content in separate database entities, the managing accomplished using a computer processor, wherein the plurality of data are associated with a plurality of products and a plurality of clients, the plurality of content is stored in at least one media-independent format and comprises at least one of a discrete text element, a compiled text element and a graphic element, and the plurality of content is associated with the plurality of data based on a plurality of rules;

packaging, using the computer processor, the plurality of rules with the plurality of content in a carrier that is independent from multiple presentation channels, wherein at least part of the plurality of content is integrated with at least part of the plurality of data, the plurality of content is packaged based on an extensible markup language (XML), and the plurality of rules are packaged based on an XSL transformations (XSLT) language;

delivering the plurality of data and the carrier to the multiple presentation channels, wherein the multiple presentation channels comprise at least one of an Internet website, a printed communication, an electronic communication, a printed advertisement, a broadcast advertisement, a telemarketing script, an interactive voice response unit message, an automatic teller machine (ATM) message, and a display-board message;

integrating, using computer processing tools at the multiple presentation channels, the

plurality of data with the plurality of content based on the plurality of rules and specific needs of

the multiple presentation channels; and

distributing the integrated data and content through the multiple presentation channels.